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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

18 ORACLE USA, INC., a Colorado corporation;
19 ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
20 CORPORATION, a California corporation,

Plaintiffs,
21 v.

22 RIMINI STREET, INC., a Nevada corporation;
SETH RAVIN, an individual,

23 Defendants.

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Case No 2:10-cv-0106-LRH-PAL

PLAINTIFFS ORACLE USA, INC.,
ORACLE AMERICA, INC., AND
ORACLE INTERNATIONAL
CORPORATION'S MOTION TO
SEAL EXHIBITS A-B, D-K, R-S, and
U-V TO THE DECLARATION OF
GEOFFREY M. HOWARD IN
SUPPORT OF THE PARTIES' JOINT
CASE MANAGEMENT
CONFERENCE STATEMENT

PLAINTIFFS' MOTION TO SEAL

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc. and Oracle International Corporation (together “Oracle” or “Plaintiffs”) respectfully request that the Court order the Clerk of the Court to file under seal Exhibits A-B, D-K, R-S, and U-V to the Declaration of Geoffrey M. Howard in Support of the Parties’ Joint Case Management Conference Statement (“Exhibits A-B, D-K, R-S, and U-V”). Exhibits A-B, D-K, R-S, and U-V were individually lodged under seal with the Court on November 4, 2011. *See* Dkt. 170-183.

10 Sealing Exhibits A-B, D-K, R-S, and U-V is requested because the documents contain
11 information that Defendant Rimini Street (“Rimini”) has designated as “Confidential
12 Information” and as “Highly Confidential Information – Attorneys’ Eyes Only” under the terms
13 of the Protective Order. The Protective Order provides that: “Counsel for any Designating Party
14 may designate any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential
15 Information – Attorneys’ Eyes Only’ under the terms of this Protective Order **only if such**
16 **counsel in good faith believes that such Discovery Material contains such information and**
17 **is subject to protection under Federal Rule of Civil Procedure 26(c)**. The designation by any
18 Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly
19 Confidential Information –Attorneys’ Eyes Only’ shall constitute a representation that an
20 attorney for the Designating Party reasonably believes there is a valid basis for such
21 designation.” Protective Order ¶ 2 (emphasis supplied).

22 Thus, in identifying Exhibits A-B, D-K, R-S, and U-V as containing Confidential and
23 Highly Confidential material, Rimini, as the designating party, contends that that good cause
24 exists for sealing Exhibits A-B, D-K, R-S, and U-V.

25 Oracle has submitted all other exhibits to the Declaration of Geoffrey M. Howard in
26 Support of the Parties' Joint Case Management Conference Statement filed November 4, 2011,
27 for filing in the Court's public files, which would allow public access to the filings except for the
28 documents Rimini has designated as Confidential and Highly Confidential. Accordingly, the

1 request to seal is narrowly tailored.

2 For the foregoing reasons, Oracle respectfully requests that the Court find that good cause
3 exists to file under seal Exhibits A-B, D-K, R-S, and U-V.

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5 DATED: November 4, 2011

BINGHAM McCUTCHEN LLP

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By: /s/ Geoffrey M. Howard

8 Geoffrey M. Howard
9 Attorneys for Plaintiffs
10 Oracle USA, Inc., Oracle America, Inc.,
and Oracle International Corp.

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